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VIA ECF

Honorable Carol Bagley Amon
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Robert Bartlett, et al. v. Société Générale de Banque au Liban, et al.*, 1:19-cv-00007

Dear Judge Amon:

On behalf of Defendant Jammal Trust Bank SAL (“JTB”) we write to respectfully request an extension of JTB’s deadline to answer the Amended Complaint until such time as the Court rules on the proposed motions for a stay. *See* ECF Nos. 167, 168. In so doing, we incorporate by reference the request of the Moving Defendants which seeks similar relief. *See* ECF No. 169.¹

On November 25, 2020, the Court denied, in part, the motion to dismiss of JTB as well as the motions filed by other defendants. ECF No. 164. As the Moving Defendants noted in their letter, “in light of the highly contested nature of the issues addressed in the Court’s decision and the fact that several appeals are currently pending before the Second Circuit that may bear on those issues, the Court expressly invited the parties to seek a stay. *Id.* at 37-38.” JTB agrees, and on December 8, 2020, wrote requesting permission to move for certification of an interlocutory appeal under 28 U.S.C. § 1292(b) and requesting a pre-motion conference. ECF No. 168.

Accordingly, JTB respectfully requests that its deadline to file an answer—which is currently December 9, 2020—be adjourned while the Court considers the stay requests. There have been no prior requests for extensions of this deadline, and the granting of this request will not impact other scheduled deadlines.²

¹ The “Moving Defendants” are defined in that request, *id.* at 1 n.1, a group which did not include JTB.

² JTB’s Motion for Substitution of Party, to Intervene, and to Dismiss Based on Subject Matter Jurisdiction and International Comity, ECF No. 163, was filed on November 17, 2020. Plaintiffs are scheduled to respond on or before December 15, 2020. JTB’s Reply, if any, is due on or before December 30, 2020. Oral argument is scheduled for January 26, 2021. The requested extension will not impact that schedule.

Honorable Carol Bagley Amon
December 9, 2020
Page 2

Plaintiffs have consented to the requests for extension as to all defendants, including JTB.
Thank you in advance for your consideration of this request.

Respectfully submitted,

/s/ David B. Rivkin, Jr.
David B. Rivkin, Jr.

cc: All Counsel of Record (via ECF only)